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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff and Counter-defendant,

v.

SONOS, INC.,

Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Sonos, Inc. (“Sonos”) hereby respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) in connection with Sonos, Inc.’s Motion For Summary Judgment of Infringement of ’885 Patent Claim 1 (“Motion”). Specifically, Sonos seeks to file under seal the information and/or document(s) listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Sonos, Inc.’s Motion For Summary Judgment of Infringement of ’885 Patent Claim 1 (“Motion”)	Portions highlighted in yellow	Google
Declaration of Dr. Kevin C. Almeroth in Support of Motion	Entire document	Google
Exhibit B to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit D to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit F to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit G to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit H to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit I to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit L to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit M to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit N to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit O to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google
Exhibit P to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Exhibit Q to the Declaration of J. Dan Smith III in Support of Motion	Entire document	Google

II. LEGAL STANDARD

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” *See* L.R. 79-5(f).

III. GOOGLE LLC’S CONFIDENTIAL INFORMATION

Sonos seeks to seal the information and/or document(s) listed in the above table because they may contain information that Google considers Confidential and/or Highly Confidential-Attorneys’ Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order entered by this Court. Dkt. 92. Sonos takes no position on the merits of sealing Google’s designated material, and expects Google to file one or more declarations in accordance with the Local Rules.

IV. CONCLUSION

In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-listed documents accompany this Administrative Motion and redacted versions are filed publicly. A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos respectfully requests that the Court grant Sonos’s Administrative Motion.

Dated: April 14, 2022

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and
LEE SULLIVAN SHEA & SMITH LLP

By: /s/ Alyssa Caridis
Alyssa Caridis

Attorneys for Sonos, Inc.